

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 18-CR-30039-MGM
	)	
EDWARD V. LABOURSOLIERE,	)	
Defendant.	)	

**JOINT INITIAL STATUS CONFERENCE MEMORANDUM**

The United States of America, by Andrew E. Lelling, United States Attorney for the District of Massachusetts, and the defendant, Edward V. Laboursolier, by and through his attorney, A.J. O'Donald, Esq., submit this memorandum to address the issues delineated in Local Rule 116.5(A)(1)-(8).

1. The government has made its automatic disclosures and the defense is reviewing the discovery materials. There are no pending discovery requests.

2. The government will provide discovery in response to any future request according to the Local Rules and pursuant to the Federal Rules of Criminal Procedure, including any supplemental discovery if any additional materials are obtained.

3. The defendant requests an additional fourteen days from the date of the initial status conference to serve any discovery requests.

4. There is no protective order in this case.

5. The defendant has not yet determined whether he will be filing any motions under Fed. R. Crim. P. 12(b).

6. The parties have not yet determined whether they will be calling expert witnesses at trial at this time.

7. The parties agree that the ends of justice are served by granting a continuance until the date of the next status conference, and excluding this time from the calculation of the time

within which the trial must begin outweighs the best interests of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A) and Local Rule 112.2. This exclusion will serve the ends of justice because it will permit time for the defendant to finish reviewing discovery produced by the government and to serve discovery requests. A proposed order of excludable delay is attached to this status report.

8. The parties request that an interim status conference be scheduled in early to mid December.

Respectfully submitted,  
ANDREW E. LELLING  
UNITED STATES ATTORNEY

By: /s/ Deepika Bains Shukla  
DEEPIKA BAINS SHUKLA  
NY4584009, CT434931  
Assistant United States Attorney  
300 State Street, Suite 230  
Springfield, MA 01105  
413-785-0237  
[deepika.shukla@usdoj.gov](mailto:deepika.shukla@usdoj.gov)

By: /s/ A.J. O'Donald  
A.J. O'DONALD  
Counsel for Edward V. Laboursoliere

Certificate of Service

October 26, 2018

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Deepika Bains Shukla  
Deepika Bains Shukla  
Assistant United States Attorney